

REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested. Currently, claims 1-20 are pending in this application.

Claim for Priority:

Section 2 of the Office Action states "...applicant has not filed a certified copy of the 99308863.2 application as required by 35 U.S.C. 119(b)." Applicant notes, however, that a certified copy of the 99308863.2 application was filed in parent U.S. application no. 09/589,200. Receipt of this certified copy was acknowledged by the Examiner in the parent application.

Objections to the Drawings and Specification:

The informalities noted in sections 4 and 5 of the Office Action have been corrected in accordance with the Examiner's helpful suggestions. Fig. 1 is directed toward the present invention and thus Applicant has not provided the legend "Prior Art". Applicant respectfully requests that the objections to the drawings and specification be withdrawn.

Rejection Under 35 U.S.C. §102:

Claims 1-14 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Gryphon et al (U.S. '537, hereinafter "Gryphon"). Applicant respectfully traverses this rejection.

For a reference to anticipate a claim, each element must be found, either expressly or under principles of inherency, in the reference. Applicant

respectfully submits that Gryphon fails to disclose each element of the claimed invention. For example, Applicant submits that Gryphon fails to disclose searching a generic process plan for a predetermined pattern contained in a non-generic process element and inserting content from the non-generic process element into the generic process plan on detection of the predetermined pattern to generate a process plan, wherein the instructions for inserting content are coded into the non-generic process element as required by claims 1-14.

Gryphon teaches a modelling language called visual business modeling language (visual BML) for the visual presentation of business applications composed of multiple “plan elements”. Visual BML is organized around a set of defined pictograms, each capable of representing elements of the application in progressively finer detail. Each pictogram (referred to as a “plan”), describes the attributes and relationships of a single planned process. Each pictogram represents an element primitive which is independently adjustable, and can be modified or enhanced without damage to the overall process because each element represents a delegation of a task primitive (including data storage), and the abstraction models can be loosely coupled. (See col. 1, lines 53 to 64). For example, the visual BML disclosed by Gryphon utilizes a pentagon symbol 145 to represent a step, a triangle symbol 156 to represent an action, a diamond symbol 154 to represent a business rule, a star symbol 152 to represent an event, and a hexagon symbol 135 to represent a translation map. Visual BML is therefore

simply a method of graphical notation that can be used to represent business process knowledge and the corresponding business information that comprises the business model. It does not directly relate to any semantic elements in a programming language. Indeed, the symbols can be used to represent a business model without a computer (col. 1, lines 4-42). Gryphon discloses that the visual BML “is not limited to computer-based implementations: hand-drawn models (as with pen and ink on paper or chalk on a blackboard) are also within the scope” of the disclosed system. (See col. 8, lines 31-35).

Visual BML appears to be somewhat similar to developing a flow chart to represent a business process, although Gryphon purports that visual BML is different from developing an ordinary flowchart in various ways as described in col. 1, line 66 to col. 2, line 29 and col. 8, lines 38-61.

Gryphon fails to disclose or suggest searching a generic process plan for a predetermined pattern contained in a non-generic process element and inserting contents from the non-generic process element into the generic process plan on detection of the predetermined pattern to generate a process plan, let alone “wherein instructions for the insertion of said content in step of inserting content are coded into said at least one non-generic process element.”

The recitation of “wherein instructions for the insertion of said content in said step of inserting content are coded into said at least one non-generic process

element” is supported by, for example, page 8, lines 9-14 of the specification which states the following:

“The process aspects 305 used are a subset of an overall available set of aspects and the process context determines their use. The aspect weaver 320 does not just append process steps onto another process. It merges aspects 305 with the GPP 300 according to weaving rules instantiated by the aspect weaver 320 and **weave instructions that are coded into the aspects 305 themselves** (emphasis added).”

Again, Gryphon fails to teach or suggest this limitation. In particular, nothing in Gryphon teaches the element primitives providing such coded instructions.

Accordingly, Applicant submits that claims 1-14 are not anticipated by Gryphon and respectfully requests that the rejection of these claims under 35 U.S.C. §102 be withdrawn.

New Claims:

New claims 15-20 have been added to provide additional protection for the invention. Since these new claims depend at least indirectly from one of claims 1, 12 and 13, Applicant submits that these claims are allowable for at least the reasons discussed above.

Claims 15, 17 and 19 further require “wherein said content inserted from at least one non-generic process element introduces a new process step into the generic process plan.” Claims 16, 18 and 20 further require “wherein said content inserted from said at least one non-generic process element advises an existing

THOMPSON et al.
Application No. 09/739,317
April 5, 2005

step of the generic process plan.” In contrast, Gryphon teaches “All of the other connected primitives are aware simply of what is passed into or taken out of a neighbor primitive, not how that primitive accomplishes its task.” (Col. 1, lines 2-65).

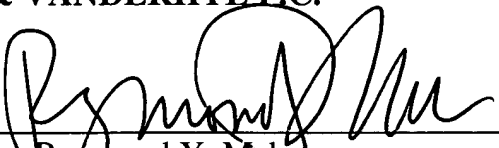
Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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By: _____


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